

**ALLACCESS LAW GROUP**  
Irene Karbelashvili, State Bar Number 232223  
[irene@allaccesslawgroup.com](mailto:irene@allaccesslawgroup.com)  
Irakli Karbelashvili, State Bar Number 302971  
[irakli@allaccesslawgroup.com](mailto:irakli@allaccesslawgroup.com)  
1400 Coleman Ave Ste F28  
Santa Clara, CA 95050  
Telephone: (408) 295-0137  
Fax: (408) 295-0142

Atorneys for JIMMY VARRIANO, Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

14 JIMMY VARRIANO, ) Case No. 3:19-cv-08188-RS  
15 Plaintiff, ) STIPULATION AND  
16 ) ORDER DISMISSING ACTION  
17 KULDIP KUMAR THAKUR, et al. ) WITH PREJUDICE  
18 Defendants. )

1 Plaintiff JIMMY VARRIANO (“Plaintiff”) and Defendants KULDIP KUMAR  
2 THAKUR, and ASHA DEVI THAKUR (collectively, “Defendants”) stipulate that this action be  
3 dismissed in its entirety with prejudice, pursuant to Fed. R. Civ. P. 41(a)(2), with each side  
4 bearing their own attorney fees, costs, and litigation expenses. The parties further request that the  
5 Court retain jurisdiction over enforcement over the parties’ settlement agreement in accordance  
6 with General Order No. 56.

7

8

Respectfully submitted,

9

10

Dated: December 8, 2020

/s/

11 Irakli Karbelashvili, Attorney for  
12 Plaintiff JIMMY VARRIANO

13

14

Dated: December 9, 2020

/s/

15 Bruce Nielson, Attorney for  
16 Defendants KULDIP KUMAR THAKUR, and  
17 ASHA DEVI THAKUR

18

19

**Filer’s Attestation**

20

21

22

23

24

25

26

27

28

I, Irakli Karbelashvili, attest that I received concurrence from Bruce Nielson in the filing  
of this document.

/s/

Irakli Karbelashvili

**ORDER**

Having reviewed the parties' stipulation, and good cause appearing, this action is dismissed in its entirety with prejudice with each side bearing their own attorney fees, costs, and litigation expenses. The court retains jurisdiction over the settlement agreement. The Order to Show Cause hearing is vacated. The Clerk shall close the case file.

**IT IS SO ORDERED.**

Dated: December 9, 2020



United States District Judge